

ALEXANDER W. KNOWLES Senior Staff Attorney

Office of Regulatory Staff 1401 Main Street Suite 900 Columbia, SC 29201 (803) 737-0800 ORS.SC.GOV

October 22, 2021

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE:

Dominion Energy South Carolina, Incorporated's Request for "Like Facility"

Determinations Pursuant to S.C. Code Ann. § 58-33-110(1) and Waiver of Certain

Requirements of Commission Order No. 2007-626

Docket No. 2021-93-E

Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff has reviewed the Joint Motion to Modify Procedural Schedule ("Joint Motion") filed on October 12, 2021 by the Sierra Club, South Carolina Coastal Conservation League, the Southern Alliance for Clean Energy, and the Carolinas Clean Energy Business Association ("Joint Movants"). ORS does not oppose the Joint Movants' request to provide legal briefing or oral argument to the Commission on the legal issues in this proceeding. However, Dominion Energy South Carolina's Response in Opposition to the Joint Motion filed by Dominion Energy South Carolina on October 22, 2021, as well as the Direct Testimony of Andrew Walker filed on October 18, 2021, assert that delaying the procedural schedule as requested in the Joint Motion may implicate significant system reliability concerns.

ORS recommends that DESC provide the Commission with an allowable *ex parte* briefing as soon as possible consistent with requirements of S.C. Code Ann. § 58-3-260 so that the Commission and all parties can hear the Company's concerns. ORS also requests that the Commission maintain the current procedural schedule in this docket at least until it has heard from the Company regarding these reliability concerns.

Thank you for your consideration in this important matter.

Sincerely,

Alexander W. Knowles

cc:

All Parties of Record (via e-mail)

C. Jo Anne Wessinger Hill, Esquire (via e-mail)

David Butler, Esquire (via e-mail)